

**Exhibit D**

**Budget and Staffing Plan**

**Budget and Staffing Plan**

**(For Matter Categories for the Period Beginning on July 13, 2022 and  
Ending on October 31, 2022)**

**Budget**

<b>Matter Number</b>	<b>Project Category Description</b>	<b>Hours Budgeted</b>	<b>Total Compensation Budgeted</b>
<b>Bankruptcy Preparation</b>			
23	Non-Working Travel	25 - 33	\$32,250 - \$40,000
<b>Bankruptcy Proceedings</b>			
2	Chapter 11 Bankruptcy Filing	285 - 371	\$312,500 - \$405,000
6	Case Administration	110 - 143	\$125,000 - \$165,000
10	Official Committee Matters and Meetings	655 - 852	\$750,000 - \$975,000
15	SOFAs and Schedules	635 - 826	\$687,500 - \$895,000
18	Disclosure Statement, Plan, Confirmation	1,360 - 1,768	\$1,500,000 - \$1,950,000
20	K&E Retention and Fee Matters	355 - 462	\$375,000 - \$490,000
21	Non-K&E Retention and Fee Matters	460 - 598	\$500,000 - \$650,000
24	U.S. Trustee Communications & Reporting	205 - 267	\$250,000 - \$325,000
43	Examiner Matters	N/A	N/A
<b>Operational Issues</b>			
5	Business Operations	555 - 722	\$625,000 - \$815,000
7	Cash Management and DIP Financing	585 - 761	\$687,500 - \$895,000
8	Customer and Vendor Communications	565 - 735	\$625,000 - \$815,000
12	Corp., Governance, & Securities Matters	420 - 546	\$500,000 - \$650,000
13	Employee Matters	635 - 826	\$750,000 - \$975,000
17	Insurance and Surety Matters	220 - 286	\$250,000 - \$325,000
22	Tax Matters	410 - 533	\$531,250 - \$690,000
<b>Adversarial Matters</b>			
3	Adversary Proceeding & Contested Matters	675 - 878	\$750,000 - \$975,000
4	Automatic Stay Matters	320 - 416	\$375,000 - \$490,000
9	Claims Administration and Objections	345 - 449	\$375,000 - \$490,000
16	Hearings	115 - 150	\$125,000 - \$165,000
27	Stone Litigation	N/A	N/A
28	Prime Trust Litigation	N/A	N/A
30	Stakeholder Litigation	N/A	N/A
31	Badger DAO Litigation	N/A	N/A
33	Reliz Limited Litigation	N/A	N/A
41	Tether Limited Litigation	N/A	N/A
42	Core Scientific Litigation	N/A	N/A

<b>Matter Number</b>	<b>Project Category Description</b>	<b>Hours Budgeted</b>	<b>Total Compensation Budgeted</b>
Asset-Related Issues			
11	Use, Sale, and Disposition of Property	795 - 1,034	\$875,000 - \$1,140,000
14	Executory Contracts and Unexpired Leases	485 - 631	\$500,000 - \$650,000
19	International Issues	215 - 280	\$250,000 - \$325,000
26	Special Committee Matters	435 - 566	\$500,000 - \$615,000
	Total		

### **Staffing Plan**

<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on the Matter Categories During the Budget Period</b>	<b>Average Hourly Rate<sup>1</sup></b>
Partner	10	\$1,669
Associate	18	\$1,050
Legal Assistant	4	\$402
<b>Total</b>	32	\$1,127

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<sup>1</sup> The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the chapter 11 cases.